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12 Attorneys for Defendant
13 Otto Trucking LLC

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 Waymo LLC,

Case No. 3:17-cv-00939-WHA

18 Plaintiff,

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO PLAINTIFF WAYMO
LLC'S MOTION FOR ORDER TO SHOW
CAUSE**

19 v.

20 Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Courtroom: 8, 19th Floor
Judge: Hon. William H. Alsup

21 Defendants.

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28 ACTIVE/91786227.1

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto
 2 Trucking”) submits this motion for an order to file under seal their Opposition to Waymo’s
 3 Motion for Order to Show Cause (the “Opposition”). Specifically, Otto Trucking requests an
 4 order granting leave to file under seal the confidential portions of the following document:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Opposition	Highlighted Portions
Exhibits 1, 2 to the Declaration of Neel Chatterjee	Entire Documents

9 The highlighted portions of the Opposition include highly confidential, sensitive business
 10 information relating to the terms of Otto Trucking’s agreements and corporate structure. This
 11 highly confidential information is not publicly known, and its confidentiality is strictly
 12 maintained. If this information were made public, Otto Trucking’s competitors and counterparties
 13 would have insight into how Otto Trucking structures its business agreements, allowing them to
 14 modify their own business strategy. Otto Trucking’s competitive standing could be significantly
 15 harmed.

16 Exhibits 1 and 2 contain highly confidential, sensitive business information of Otto
 17 Trucking relating to terms of Otto Trucking’s agreements, corporate structure, and financial
 18 information. This highly confidential information is not publicly known, and its confidentiality is
 19 strictly maintained. If this information were made public, Otto Trucking’s competitors and
 20 counterparties would have insight into how Otto Trucking structures its business agreements,
 21 allowing them to modify their own business strategy. Otto Trucking’s competitive standing could
 22 be significantly harmed.

23 Otto Trucking’s request to seal is narrowly tailored to those portions of the Opposition and
 24 supporting documents that merit sealing.

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1 Dated: July 5, 2017

Respectfully submitted,

2 By: /s/ Neel Chatterjee
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 5, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 5th day of July 2017 in Menlo Park, California.

/s/ Neel Chatterjee
Neel Chatterjee